

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT  
OKLAHOMA COUNTY, OKLA.

APR 28 2011

PATRICIA PRESLEY, COURT CLERK  
by \_\_\_\_\_  
DEPUTY

Oklahoma Department of Securities )  
*ex rel.* Irving L. Faught, )  
Administrator, )

Plaintiff, )

v. )

Case No. CJ-2009-6989

Bothwell Consulting, LLC, an Oklahoma )  
LLC; Lawrence G. Bothwell, an individual; )  
Christopher S. VonWerder, an individual; )  
and Tommy L. Richardson, an individual, )

Defendants, )

and )

Amy J. Richardson, an individual, )

Defendant Solely For )  
Purposes of Equitable Relief. )

**STIPULATION AND CONSENT**

Defendant Tommy L. Richardson (Defendant) stipulates to the following facts:

1. Plaintiff is the proper party to bring this action seeking the relief requested in the *Application for Citation of Contempt Against Tommy L. Richardson* (Application) filed in this matter.
2. Defendant is subject to the jurisdiction of this Court and this Court has subject matter jurisdiction of this action.
3. On October 8, 2009, the Court entered a default judgment against Tommy L. Richardson which, in part, ordered a permanent injunction forever enjoining and restraining him from offering and/or selling securities in and/or from the state of Oklahoma.

Defendant hereby undertakes as follows:

1. Defendant consents to the entry of the *Order Dismissing Application for Citation of Contempt Against Tommy L. Richardson* ("Order"), in the form attached hereto as "Exhibit A".

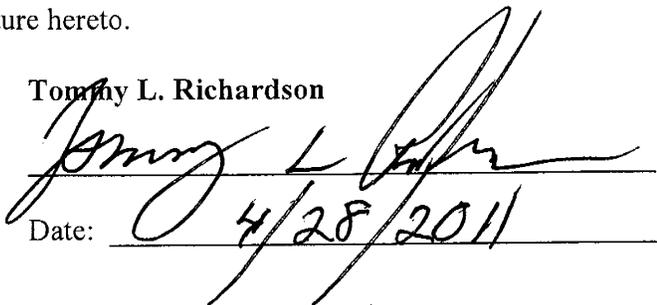
2. Defendant acknowledges the permanent injunction forever enjoining and restraining him from offering and/or selling securities in and/or from the state of Oklahoma.

3. Defendant states that this *Stipulation and Consent* is entered into voluntarily and that no threat or promise of immunity of any kind has been made by the Administrator of the Oklahoma Department of Securities, any employee of the Oklahoma Department of Securities, or any member of the Oklahoma Securities Commission, to induce Defendant to enter into this *Stipulation and Consent*.

4. Defendant agrees to the presentation of this *Stipulation and Consent* and the Order to the Court to be entered without further notice to Defendant.

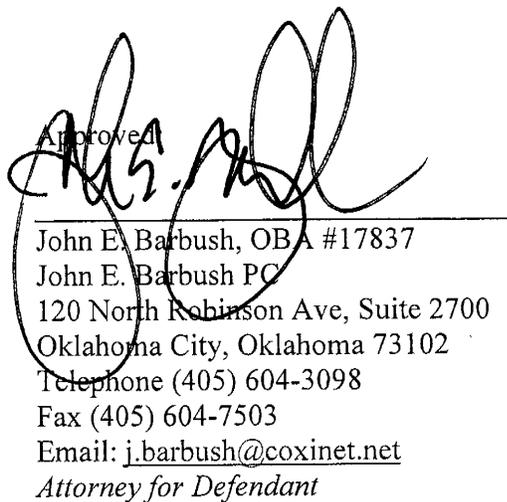
IN WITNESS WHEREOF, Defendant has executed this *Stipulation and Consent* as of the date and year set forth below his signature hereto.

Tommy L. Richardson

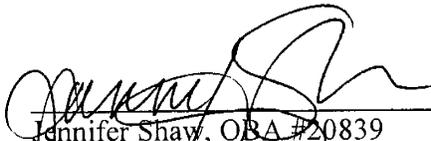


Date: 4/28/2011

Approved



John E. Barbush, OBA #17837  
John E. Barbush PC  
120 North Robinson Ave, Suite 2700  
Oklahoma City, Oklahoma 73102  
Telephone (405) 604-3098  
Fax (405) 604-7503  
Email: [j.barbush@coxinet.net](mailto:j.barbush@coxinet.net)  
*Attorney for Defendant*



---

Jennifer Shaw, OBA #20839  
Amanda Commesser, OBA #20044  
Oklahoma Department of Securities  
120 North Robinson, Suite 860  
Oklahoma City, Oklahoma 73102  
Telephone (405) 280-7700  
Fax (405) 280-7742  
Email: [jshaw@securities.ok.gov](mailto:jshaw@securities.ok.gov)  
[acornmesser@securities.ok.gov](mailto:acornmesser@securities.ok.gov)  
*Attorneys for Plaintiff*

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA**

Oklahoma Department of Securities )  
*ex rel.* Irving L. Faught, )  
Administrator, )

Plaintiff, )

v. )

Case No. CJ-2009-6989

Bothwell Consulting, LLC, an Oklahoma )  
LLC; Lawrence G. Bothwell, an individual; )  
Christopher S. VonWerder, an individual; )  
and Tommy L. Richardson, an individual, )

Defendants, )

and )

Amy J. Richardson, an individual, )

Defendant Solely For )  
Purposes of Equitable Relief. )

**ORDER DISMISSING**  
**APPLICATION FOR CITATION OF CONTEMPT AGAINST**  
**TOMMY L. RICHARDSON**

On this 28th day of April, 2011, this matter came before the undersigned Judge of the District Court in and for Oklahoma County, State of Oklahoma, for entry by consent of this *Order Dismissing Application for Citation of Contempt Against Tommy L. Richardson* (“Order”). After a review of the pleadings and Defendant’s *Stipulation and Consent*, this Court finds:

On January 6, 2011, Plaintiff filed an *Application for Citation of Contempt Against Tommy L. Richardson* (Application) alleging that Tommy L. Richardson had violated the Court’s October 8, 2009, *Default Judgment against Defendant Tommy L. Richardson and Relief Defendant Amy J. Richardson* (Default Order) and continued to engage in violations of the

**EXHIBIT**  
          A

Oklahoma Uniform Securities Act of 2004 (Act), Okla. Stat. tit. 71, §§1-101 through 1-701 (Supp. 2009), in connection with the offer and/or sale of securities in and/or from Oklahoma. Defendant executed the *Stipulation and Consent* attached hereto as "Exhibit A" and made a part hereof. Plaintiff has no objection to the terms of the *Stipulation and Consent* and agrees to the entry of this Order.

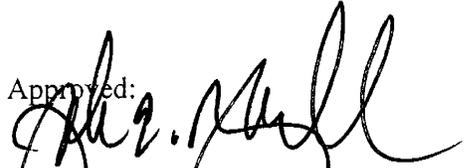
Based on the pleadings and execution of the *Stipulation and Consent*, the Court finds that this Order dismissing the Application should be entered, and therefore:

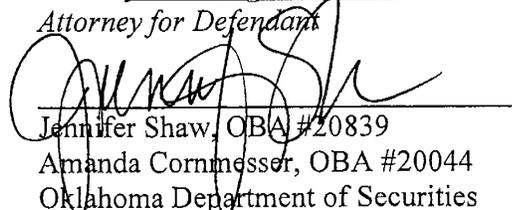
IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the Application is dismissed.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2011.

\_\_\_\_\_  
JUDGE OF THE DISTRICT COURT

Approved:

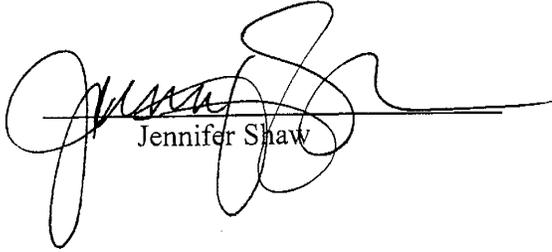
  
\_\_\_\_\_  
John E. Barbush, OBA #17837  
John E. Barbush PC  
120 North Robinson Ave, Suite 2700  
Oklahoma City, Oklahoma 73102  
Telephone (405) 604-3098  
Fax (405) 604-7503  
Email: [j.barbush@coxinet.net](mailto:j.barbush@coxinet.net)  
*Attorney for Defendant*

  
\_\_\_\_\_  
Jennifer Shaw, OBA #20839  
Amanda Cornmesser, OBA #20044  
Oklahoma Department of Securities  
120 North Robinson, Suite 860  
Oklahoma City, Oklahoma 73102  
Telephone (405) 280-7700  
Fax (405) 280-7742  
Email: [jshaw@securities.ok.gov](mailto:jshaw@securities.ok.gov)  
[acornmesser@securities.ok.gov](mailto:acornmesser@securities.ok.gov)  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 28<sup>th</sup> day of April, 2011, a copy of the foregoing *Order Dismissing Application for Citation of Contempt Against Tommy L. Richardson* was mailed by first class mail with postage prepaid to:

John E. Barbush  
John E. Barbush PC  
120 North Robinson Ave, Suite 2700  
Oklahoma City, Oklahoma 73102

  
Jennifer Shaw